

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>Case No: 1:21-CR-200</b>
	:	
<b>MOUAAZ ELKHEBRI,</b>	:	<b>The Hon. Claude M. Hilton</b>
	:	
<b>Defendant.</b>	:	

---

**UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE**

Mouaaz Elkhebri, by his undersigned counsel, respectfully moves this Honorable Court to modify the Order setting his conditions of release. In support of this request, Mr. Elkhebri offers the following:

1. On November 30, 2021, Mr. Elkhebri entered a guilty plea to conspiracy to commit money laundering. His sentencing hearing is scheduled for March 11, 2022.
2. At time of his arrest, the government was unsure whether Mr. Elkhebri and his co-defendants were involved with an underlying wire fraud conspiracy. As a result, Mr. Elkhebri's pretrial release conditions included a prohibition against him using any computer, internet accessible telephone, or gaming system without installing a computer monitoring system.
3. The government now realizes that Mr. Elkhebri had no involvement with the underlying wire fraud and that there is no longer any need for the restriction on using a computer, phone or gaming system.
4. On January 20, 2022, the Court granted a similar request by Mr. Elkhebri's co-defendant, Anthony Ayeah (Criminal Case 1:21-cr-242).

5. Undersigned counsel has conferred with counsel for the government, Mr. Christopher Hood, who has no objection to this motion to Modify Conditions of Release.

WHEREFORE, Mr. Elkhebri respectfully requests that this Honorable Court modify the conditions of his pretrial release to strike the conditions listed by the letters (u) and (v) o page four of his Order Setting Conditions of Release, thereby allowing unrestricted use of internet and gaming devices.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Joan C. Robin  
Virginia Bar No. 44502  
Law Office of Joni C. Robin, PLLC  
114 North Alfred Street  
Alexandria, Virginia 22314  
Ph: 703-349-1111  
Fax: 571-279-6851  
[joni@jonirobinlaw.com](mailto:joni@jonirobinlaw.com)

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of February, 2022, I will electronically file the foregoing Notice with the Clerk of Court using the CM/ECF system, which will then send a notification of said filing (NEF) to counsel of record.

\_\_\_\_\_/s/\_\_\_\_\_  
Joan Robin